

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

**BRG HARRISON LOFTS URBAN
RENEWAL, LLC**

Plaintiff

vs.

**GENERAL ELECTRIC COMPANY,
ENVIRONMENTAL WASTE
MANAGEMENT ASSOCIATES, LLC,
and ACCREDITED ENVIRONMENTAL
TECHNOLOGIES, INC.,**

Defendants

CASE NO. 2:16-CV-06577-SRC-CLW

**NOTICE OF MOTION FOR AN ORDER
CONSOLIDATING ACTIONS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 42(a) AND LOCAL
CIVIL RULE 42.1**

EVANSTON INSURANCE COMPANY.

Plaintiff

vs.

**ACCREDITED ENVIRONMENTAL
TECHNOLOGIES, INC.,
ENVIRONMENTAL WASTE
MANAGEMENT ASSOCIATES, LLC,
and BRG HARRISON LOFTS URBAN
RENEWAL, LLC**

Defendants

CASE NO. 2:17-CV-01584-JMV-JBC

**NOTICE OF MOTION FOR AN ORDER
CONSOLIDATING ACTIONS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 42(a) AND LOCAL
CIVIL RULE 42.1**

TO:

Michael J. Jones, Esquire
Rivkin Radler
21 Main Street
Court Plaza South
West Wing - Suite 158
Hackensack, NJ 07601

Neil L. Sambursky, Esquire
Miranda Sambursky, et al
240 Mineola Boulevard
Mineola, NY 11501

Angelo A. Cuonzo, Esquire
Slowinski Atkins, LLP
Eisenhower Corporate Campus
290 West Mount Pleasant Avenue
Suite 2310
Livingston, NJ 07039

Timothy E. Corrison, Esquire
Connell Foley, LLP
85 Livingston Avenue
Roseland, NJ 07068-1765

Ira M. Gottlieb, Esquire
McCarter & English, LLP
100 Mulberry Street
4 Gateway Center
Newark, NJ 07102

David M. Dugan, Esquire
Chiesa Shahnian & Giantomasi, PC
One Boland Drive
West Orange, NJ 07052

TAKE NOTICE that on **Monday, June 5, 2017 at 9:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned attorney for Defendant, Accredited Environmental Technologies, Inc., will move before such Judge or Judges of this Honorable Court as are to hear this Motion at the United States District Court for the District of New Jersey at the Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101 for an Order to consolidate the above-captioned civil action entitled Evanston Insurance Company v. Accredited Environmental Technologies, Inc., et al, docketed in this Honorable Court at Case No. 2:17-CV-01584-JMV-JBC with the above-captioned civil action entitled BRG Harrison Lofts Urban Renewal, LLC v. General Electric Company, et al., docketed in this Honorable Court at Case No. 2:16-CV-06577-SRC-CLW, so that all further filings shall be made solely in the above-captioned civil action entitled BRG Harrison Lofts Urban Renewal, LLC v. General Electric Company, et al., docketed in this Honorable Court at Case No. 2:16-CV-06577-SRC-CLW.

Defendant, Accredited Environmental Technologies, Inc.

- () waives oral argument and consents to disposition on the papers.
- (X) requests oral argument if this motion is contested.
- () requests oral argument.

In support of its Motion and for the reasons stated therein, Defendant, Accredited Environmental Technologies, Inc., shall rely on the attached Declaration and on the attached Memorandum of Law.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.

Respectfully submitted,

**LEONARD, SCIOLLA, HUTCHISON,
LEONARD & TINARI, LLP**

By: 

Keith N. Leonard, Esquire
72 East Main Street
Moorestown, New Jersey 08057
Telephone: (856) 273-6679
Fax: (856) 273-0109
E-mail: kleonard@leonardsciolla.com
Attorney for Defendant,
Accredited Environmental
Technologies, Inc.

Dated: April 27, 2017